

**KENTUCKY WIRELESS INTEROPERABILITY EXECUTIVE COMMITTEE
PUBLIC SAFETY WORKING GROUP
REGION 17 700MHz PLANNING COMMITTEE**

20 JUNE 2008

The Public Safety Working Group (Region 17 Regional Planning Committee) of the Kentucky Wireless Interoperability Executive Committee supports the premise that a nationwide and/or regional public safety network should be established and has resources to contribute to the solution. The acceptable business case Kentucky can afford is an infrastructure partnership that envisions sharing vertical real estate and our existing digital microwave system with the "commercial interest." Our broadband network business model "must" include sharing our numerous earthquake hardened towers and digital microwave backbone with the commercial interest in return for an acceptable and agreed upon rate for service and hardware.

Kentucky established a comprehensive 800MHz Mobile data standard in 2004 and installed a statewide infrastructure for this network. Contributing to the success of the system is the fact that the Commonwealth of Kentucky has installed and maintains the network and all state and local users operate at no cost except for the initial cost of the mobile equipment. The network operates on Kentucky's public safety microwave communications system (KEWS) and connects all public safety agencies including both law enforcement and all other public safety disciplines.

Kentucky's system is widely accepted, fills a critical communications need and is designed for the future. Planning was underway to upgrade our present 800MHz data system into a robust 700MHz broadband data system statewide with varying bandwidth until the 700MHz channels were removed from state control. We firmly believe in national standards for 700 MHz mobile data and for future growth through broadband data, however we are concerned about how a commercial interest and government can have a productive business relationship and how our many under-funded local jurisdictions can afford "another" commercial solution.

Region 17 favors a spectrum solution that involves a standards base for both wideband (50 KHz - 150 KHz) and broadband channels (above 1 MHz bandwidth). The wideband channel would give greater coverage in rural areas but have a lower data rate and broadband for usage in urban / suburban areas or which ever fits the department's need the best. This could be similar to some user having dial up service while other have DSL and broadband cable.

In summary, Region 17 supports in part the national need for broadband for Public Safety but with the option and flexibility to partner with the commercial interest on infrastructure, digital network and equipment.

Thank you for your consideration of these comments. We look forward to working with the Commission as it addresses these matters of great importance to public safety agencies.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Bob Stephens".

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Robert Stephens

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